



State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

6 Hazen Drive, P.O. Box 95, Concord, NH 03302-0095
(603) 271-3503 FAX (603) 271-5171



April 23, 2004

LETTER OF DEFICIENCY #WSEB #04-057
Certified Mail #7000 0600 0023 9933 8149
And Via Fax #604-922-7879

Stephen Hynes
1571 Bellevues Suite 210
West Vancouver, BC V7V 1A6

Subject: Allentown - Public Water System: Holiday Acres/Summit (EPA #0043060)

Dear Mr. Hynes:

The records of the NH Department of Environmental Services (DES) show that Holiday Acres/Summit water system is classified as a public water system (PWS), as defined by RSA 485:1-a. A PWS is defined as any water system supplying 15 or more services, or 25 or more people for 60 or more days per year. As such, the water system owner is required to submit samples according to the system's established Master Sampling Schedule to the State laboratory or a State-certified laboratory in compliance with NH Administrative Rule Env-Ws 321 through 330.

The federal Environmental Protection Agency recently promulgated new radionuclide rules governing the acceptable levels of radionuclides in the Nation's public water systems. Consequently, DES adopted new rules in conformance with the federal requirements. New maximum contaminant levels (MCLs) were established and additional requirements instituted for the currently regulated radionuclides. (Note that the Uranium standard became effective in January, 2004 and compliance will be determined upon completion of four quarterly samples.) As a result of the new regulatory requirements, prompting a review of historical water quality data by senior DES staff, we realize that the following have been in violation.

SITE: 501 – DEP TAP IN SUMMIT PUMPHOUSE/001

Contaminant	MCL (units)	Historical range	Latest result (date)	Violation (yes/no)
Compliance gross alpha	15 pCi/L	14-34.9 pCi/L	34.9 pCi/L (3/8/04)	yes
Uranium	30 ug/L	3.7 – 21 ug/L	3.7 ug/L (3/8/04)	no
Radium 226 & Radium 228	5 pCi/L	12.1 – 15.5 pCi/L	15.5. pCi/L (3/8/04)	yes

DES believes the MCL violation(s) can be corrected and future violations prevented by taking the following actions:

By May 7, 2004, provide public notice of the exceedence(s) following the guidelines on the enclosed public notice handout. Notices must remain posted for as long as the exceedence continues; and

By May 17, 2004, provide proof of public notice to this office following the guidelines on the enclosed public notice handout; and

3. **By May 21, 2004**, retain the services of a qualified consultant to address the water quality violations and notify DES, in writing, of the name of the consultant hired. The consultant should review all existing water quality data prior to making recommendations for correcting the MCL violation(s); and
4. **By June 24, 2004**, submit to DES the consultant's report, which shall contain the consultant's recommendations, and cost estimates, along with an implementation schedule to correct the MCL violation(s). A maintenance schedule must be included if treatment is proposed. DES must approve the consultant's report/recommendations, the maintenance schedule, and the proposed implementation schedule prior to any work being done on the system; and
5. By the DES-approved correction date, correct the violation or install treatment as approved by DES. Notify DES in writing of the correction(s) taken; and
6. Continue to sample in accordance with your Master Sampling Schedule, which includes **quarterly sampling for radionuclides.**

In the event compliance is not achieved within this period, DES may take further enforcement action. These actions include issuing an order requiring the deficiencies to be corrected, initiating an administrative fine proceeding, and/or referring the matter to the NH Department of Justice for imposition of appropriate penalties.

The information as requested above should be addressed as follows or faxed to (603) 271-5171

Anne Bailey
Department of Environmental Services
Water Supply Engineering Bureau
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095

Further review of your system's water quality indicates that your system has also had a history of Arsenic exceedences. A Letter of Deficiency (LOD# 02-137) was issued to you on September 20, 2002. Your response to this LOD was to initiate blending of two wells as a temporary solution and install Arsenic treatment as part of an EPA pilot study for your long-term solution. Since that time your system has withdrawn from the pilot study. Note that while the average Arsenic levels over the past year have been below the currently enforceable 0.05 mg/L standard, as relayed to you in a recent "Notice of Arsenic Exceedence" letter dated April 9, 2004, compliance with the new 0.01 mg/L standard must be met by January 22, 2006.

In addition, the manganese levels have consistently been above the secondary maximum contaminant level (SMCL) of 0.05 mg/L. Since 1996, the average level has been 0.11 mg/L. In general this contaminant poses aesthetic concerns (e.g. taste, odor, or staining) and is not currently a health concern. Although the manganese SMCL is enforceable, corrective action will not be required unless consumer complaints arise. It is important to also note that while a radon standard has not yet been finalized, your levels have ranged from 16,000 to 29,000 pCi/L, with an average of 18,800 pCi/L. The most recent Federal standard proposed was 400 pCi/L.

DES recognizes that blending of the adjacent Upper well with the Summit well has been utilized in the past to lower the levels of Arsenic and/or Radionuclides in the distribution system. It is not clear from the record, or through conversations with DES staff and your operator, exactly how long this has been utilized or to what degree it has been effective. It is, however, our understanding that the values listed in the above table may not be representative of the actual water served to the consumers. These source samples may represent the worst-case scenario. Your response and your public notice may expand upon the actual water source(s) and distribution in your system as well as actions taken to ensure that the public is not consuming water above all applicable MCLs.

Fact sheets on Mineral Radioactivity, Arsenic, and Removing Iron and Manganese from Drinking Water are enclosed for your review. These include general information, health effects and removal options. Please be reminded that proposed treatment alternatives should take into consideration all water quality parameters as well as current and future quantity needs. Bernie Lucey, P.E., may be able to answer questions concerning treatment for the aforementioned contaminants. He may be reached at (603) 271-2952 or via email at blucey@des.state.nh.us. If you have any questions regarding this letter, please contact Selina J. Makofsky, P.G., at (603) 271-4109 or by email at smakofsky@des.state.nh.us.

Sincerely,

COPY

Rene Pelletier, P.G., Manager
Land Resource Programs

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Encls: Public Notice Form
Radionuclide, Arsenic, and Iron/Manganese Fact Sheets

cc: Gretchen R. Hamel, DES Legal Unit Administrator (w/out encls.)
Bernie Lucey, P.E., DES (via email w/out encls.)
Town of Allenstown Health Officer
Stedman Holton, Primary Contact
Joseph Damour, Primary Operator
Beth Debay, EPA, Region 1 (via email w/out encls.)
Douglas Brogan, NH Dept. Public Utilities Commission (w/out encls.)